

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

UNITED STATES OF AMERICA)	CRIMINAL No.: 8:20-cr-00452-DCC
)	
vs.)	SECOND CONSENT MOTION FOR EXTENSION OF
)	TIME TO FILE OBJECTIONS TO PRESENTENCE
JOHN TOWERY,)	INVESTIGATION REPORT
Defendant.)	
_____)	

The Defendant, John Towery, by and through his attorney, moves this Honorable Court for an Order granting the Defendant a fourteen (14) day extension in which to file his objections to the Presentence Investigation Report. The objections are presently due on November 29, 2021. Counsel needs additional time to meet with Mr. Towery and prepare objections.

Counsel discussed this motion with Assistant United States Attorney Carrie Fisher and U.S. Probation Agent Travis Smith, who consent to this motion.

WHEREFORE, the undersigned prays for an Order granting a 14-day extension until December 13, 2021, to file objections to the Presentence Investigation Report.

Respectfully submitted,

RAME CAMPBELL LAW FIRM, LLC

s/ Rame L. Campbell

Rame L. Campbell (Fed. Bar # 7737)

P.O. Box 2005

Anderson, SC 29622

Ph: (864) 712-9636 Fax: (864) 712-9637

Email: ramecampbelllaw@gmail.com

ATTORNEY FOR DEFENANT JOHN TOWERY

November 23, 2021